

REMARKS

This Amendment is in response to the Office Action dated April 17, 2006. In the Office Action, claims 1-40 were rejected. With this Amendment, the Specification is amended, claims 1, 3, 5, 11, 12, 15, 18, 20, 22, 25, 26, 31, 32 and 37-40 are amended and claim 30 is canceled. It is respectfully submitted that claims 1-29 and 31-40 are in condition for allowance.

As a preliminary matter, a Supplemental Information Disclosure Statement is submitted herewith that specifies the pertinent pages of the publications previously submitted in an Information Disclosure Statement filed on July 1, 2004 and received by the USPTO on July 6, 2004. In addition, the Information Disclosure Statement submitted herewith includes copies of those references. Applicant respectfully requests reconsideration of these references.

The drawings were objected as failing to comply with 37 C.F.R. §1.84(p)(5) because the reference character 312 was not included in the description. Accordingly, the Specification has been amended.

I. § 102(e) Rejections

Claims 15-16 and 33-34 were rejected under 35 U.S.C. § 102(e) as being anticipated by Bjurstrom et al. (US 6,594,348). Independent claims 15 and 33 are amended. It is respectfully submitted Bjurstrom et al. fails to teach or suggest all of the claim elements in independent claims 15 and 33.

In particular, Bjurstrom et al. fails to teach or suggest “controlling a display module to display the modified plurality of browsing modes to a plurality of users in a shared display environment, the plurality of users each having their own type of portable input device” as claimed in claim 15 and “a hypertext display controller configured to display the plurality of browsing modes and alternate browsing activation tags to a plurality of users in a shared display environment, the plurality of users each having their own type of portable input device” as claimed in claim 33. In addition, Bjurstrom et al. fails to teach or suggest “activating a particular browsing mode by receiving an input signal related to a particular alternate browsing activation tag from at least one of the portable input devices of one of the plurality of users” as claimed in

claim 15 and “an input processor configured to receive and process an input signal related to a particular alternate browsing activation tag from at least one of the portable input devices of one of the plurality of users” as claimed in claim 33. It is respectfully submitted that claims 15 and 33 are in condition for allowance. Claims 16 and 34 are also in condition for allowance at least based on their dependency on allowable claims 15 and 33.

II. § 103(a) Rejections

A. Claims 1-6, 14, 20-24, 27-28, 30-31 and 37-39

Claims 1-6, 14, 20-24, 27-28, 30-31 and 37-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. (US 2002/0107888). Independent claims 1, 22 and 38 are amended, dependent claims 3, 5, 20, 31, 37 and 39 are amended and claim 30 is canceled. It is respectfully submitted that the combination of cited references fail to teach or suggest all of the claim elements in independent claims 1, 22 and 38.

On page seven of the Office Action, the Examiner states that Bjurstrom et al. fails to disclose “a display model [sic]¹ to display the converted component in the hypertext document.” The Examiner points to Chiu et al. as disclosing the ability “to display a web page with hyperlinks displaying corresponding numbers next to the hyperlinks so the user can operate function keys using numeric key to access the links.” However, even if one were to combine these references, the combination of references fail to teach or suggest “controlling a display module to display the converted component in the hypertext document to a plurality of users in a shared display environment, the plurality of users each having their own type of portable input device” as claimed in claim 1, “a hypertext display controller configured to instruct a display module to display the converted component in the hypertext document to a plurality of users in a shared display environment, the plurality of users each having their own type of portable input device” as claimed in claim 22 and “controlling a display to display the symbol representing the converted component to a plurality of users in a shared display environment, the plurality of users each having their own type of portable input device” as claimed in claim 38. As

¹ The correctly referenced claim element of claims 1 and 22 should be a display module.

emphasized, none of the cited references disclose a shared display environment let alone controlling a display or display module to display the converted components to plurality of users that have their own type of portable input device. In addition, the cited references also fail to teach or suggest receiving and processing an input signal from one of the portable input devices of one of the plurality of user as claimed in claims 1, 22 and 38.

It is respectfully submitted that independent claims 1, 22 and 38 are in condition for allowance. In addition, it is respectfully submitted that claims 2-6, 14, 20-21, 23-24, 27-28, 31, 37 and 39 are condition for allowance for at least depending on allowable base claims 1, 22 and 38. However, these dependent claims are also allowable for additional reasons. For example, the combination of references fail to teach or suggest “different types of input signals from the different types of portable input devices belonging to each user into a form that the browsing system can recognize” as claimed in claim 4.

B. Claims 7 and 9

Claims 7 and 9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Lai et al. (US 6,912,326). It is respectfully submitted that claims 7 and 9 are in condition for allowance at least based on their dependency on allowable claim 1.

C. Claim 8

Claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., further in view of Lai et al. and further in view of Sotomayor (US 5,708,825). It is respectfully submitted that claim 8 is in condition for allowance at least based on its dependency on allowable claim 1.

D. Claims 10-13, 17-19, 29, 35-36 and 40

Claims 10-13, 17-19, 29, 35-36 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Borman et al. (US

6,226,955). Claims 10-12, 17, 36 and 40 are amended. It is respectfully submitted that claims 10-13, 17-19, 29, 35-36 and 40 are in condition for allowance at least based on their dependency on allowable claims 1, 15, 22, 33 and 38.

However, these dependent claims are allowable for additional reasons. For example, the cited references fail to teach or suggest “controlling the display module to display the automated browsing modes and automated browsing activation tags to the plurality of users in the shared display environment” as claimed in claim 10, “controlling the display module to display the automated browsing modes and automated browsing activation tags to the plurality of users in the shared display environment” as claimed in claim 17 and “controlling the display module to display the plurality of automated browsing modes and automated browsing activation tags to the plurality of users in the shared display environment” as claimed in claim 40.

E. Claims 25 and 26

Claims 25 and 26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Tanenbaum. Both claims 25 and 26 are amended. It is respectfully submitted that claims 25 and 26 are in condition for allowance at least based on their dependency on allowable claim 22.

However, these dependent claims are allowable for additional reasons. For example, the cited references fail to teach or suggest “the input processor is further configured to process different types of input signals received from the different types of portable input devices belonging to each user into a form that the browsing system can recognize” as claimed in claim 25 and “the input processor is further configured to implement a scheduling algorithm to process the different types of input signals received from the different types of portable input devices belonging to each user in an order” as claimed in claim 26.

F. Claim 32

Claim 32 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Giacalone, Jr. (US 2001/0052000). It is

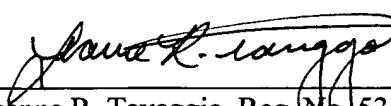
respectfully submitted that claim 32 is in condition for allowance at least based on its dependency on allowable claim 22.

For the reasons stated above, it is respectfully submitted that all pending claims 1-29 and 31-40 are in condition for allowance. Favorable action is respectfully requested. Although Applicant did not present reasons above for allowability of the pending claims pertaining to a lack of suggestion or motivation to combine cited references, it is respectfully pointed out that the Federal Circuit has held that rejecting patents solely by finding prior art corollaries for the claimed elements would permit an Examiner to use a claimed invention itself as a blueprint for piecing together elements in the prior art to defeat the patentability of the claimed invention, which would be "an illogical and inappropriate process by which to determine patentability." *In re Rouffet*, 149 F.3d 1350, 1357 (Fed. Cir. 1998) (citing *Sensonics, Inc. v. Aerasonic Corp.*, 81 F.3d 1566, 1570, 38 USPQ.2d 1551, 1554 (Fed. Cir. 1996)). It seems that the Examiner is using Applicant's claimed invention as a blueprint for piecing together elements in multiple different prior art references to defeat the patentability of the claimed invention. This is an inappropriate procedure based on the cited case law.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: 

Leanne R. Taveggia, Reg. No. 53,675
900 Second Avenue South – Suite 1400
Minneapolis, Minnesota 55402-3319
Phone: (612) 334-3222 Fax: (612) 334-3312

LRT/jme